## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN NORTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff, No. 2:23-cr-13

vs. Hon. Paul L. Maloney

U.S. District Judge

STEPHEN JAMES WEBSTER, Hon. Maarten Vermaat U.S. Magistrate Judge

Defendant.

## GOVERNMENT'S MOTION FOR DETENTION

The United States moves for pretrial detention of defendant. Under 18 U.S.C. § 3142(f)(1)(A), defendant is charged with a crime of violence. *United States v. Thompson*, No. 12-CR-20656, 2015 WL 1780801, at \*7 (E.D. Mich. Apr. 20, 2015) (concluding Michigan assault with intent to do great bodily harm and/or assault by strangulation qualifies as crime of violence under USSG § 4B1.2's elements clause). Therefore, the court "shall hold a hearing to determine whether any condition or combination of conditions . . . will reasonably assure the appearance of such person as required and the safety of any other person and the community." 18 U.S.C. § 3142(f). Under § 3142(f)(2), the United States moves for a continuance of 3 days to prepare for the hearing.

Respectfully submitted,

MARK A. TOTTEN United States Attorney

Dated: November 15, 2023 <u>/s/ Theodore J. Greeley</u>

THEODORE J. GREELEY Assistant United States Attorneys